REMARKS

Applicant has amended claims 18 and 19 to remove an objection on form, leading to a rejection based in section 112. Objection to the lack of structure in a method claim is not fully understood and it is believed that with the correction of antecedent basis issues in these two claims that the rejection is well met. Reconsideration of the rejection of claim 19 is therefore respectfully requested.

Regarding the substantive rejection, the applicant fails to understand how the cited references can be shown to provide the claimed features of the invention in this application. The claims specifically now recite that the queue bank repository comprises a functionality for retrieving any requested queue bank descriptor from the queue bank repository. The references cited depend upon retrieving in order, thus they do not provide the substantive teaching to support a rejection of these claims since they do not provide for retrieval of ANY item, as that term (any) is used in the claim, regardless of order. It is possible that one could read the claims by first assuming that there is order dependence and therefore the references supply a way to get (eventually) to any item, but the application itself teaches that this is an important feature and thus suggests the claims NOT be interpreted in that manner. It is unclear that the examiner is reading them in this way in any event, and if that is the case, the applicant would offer to amend to stipulate that the claims are covering order independent retrieval, rather than order dependent retrieval of "any" item. If this misunderstanding is the root of the rejection, the applicant respectfully solicits a telephonic discussion to clarify the claims to that effect. To see support for this order independence in the application, note the summary table of differences on page 18, for example. A REPOSITORY is UNORDERED (any slot), it very clearly says in this table. See

also the application example bridging pages 16 and 17. In fact, the whole idea of rapid access to
any one of numerous items (a basic impetus for the invention as set forth in the background,
bottom of page 1) would be thwarted by having to read through long lists to get to particular
items rather than providing order independent retrieval. This feature is not existent in any of the
references.

As part of enabling this random ordered retrieval, the applicant, at the end of claim 1 (and
with similar language at the end of claim 10), states "putting the address of the returned entry
into the next available entry". This limitation is not seen in the references either. It is apparent
that the references, if they allow for retrieval of any item, only do so through paging through a
list, something that this invention avoids for all the reasons stated, as enabled in part by this
quoted limitation. Hence, the claims should all be allowable over the cited references which do
not appear to have this element as a requirement or even a teaching in them.

To address specific deficiencies of the references, it is clear that the Hughes reference is
addressing how to access *any queue*, however it *does not teach* how to get any items out *of a
queue in any order*. Hughes does not teach how any queue bank descriptor can be retrieved by a
token given in any order. While the Fischler reference teaches enqueing and dequeing (as do the
references cited in our Invention Disclosure Form submitted herewith) it does not teach UN-
ORDERED enqueing and dequeing.

In light of the fact that the references cited do not appear to be any closer, in the
applicant's opinion to the invention, an IDF with two patents on it is submitted herewith which
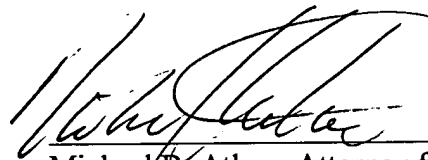also does not provide for the order independent retrieval of items as claimed, but which the

applicant sees as closer to the field of endeavor in which this invention exists than the art

heretofore cited by the examiner. These references describe dequeing and enqueing and provide

what the applicant feels is appropriate background for this invention.

The claims cover a queue bank repository and its manager and the functions thereof. The

deposit and retrieval of items through use of the manager is order independent and features

enabling this order independence are elements of most of the claims as discussed above. These

features are not found anywhere in the prior art, nor is the system they together form.

Accordingly the claims should be allowed. The combination of references do not meet the claims

and reconsideration and withdrawal of the substantive rejection is respectfully solicited.

Applicant respectfully requests allowance of all claims and that this case be promptly

passed to issue.

Respectfully submitted,

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